

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,)	
)	
Plaintiff,)	
)	Case No. 19-CV-06137-BP
v.)	
)	
CITY OF ST. JOSEPH, ET AL.,)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS

COME NOW Plaintiff Stacy Arnold (“Plaintiff”), *pro se*, and Defendants St. Joseph Public Library, City of St. Joseph and Rebecca Hailey (“Defendants”), by and through their attorneys, and respectfully move this Court for a mutual extension of time for the filing of dispositive motions. In support of this joint motion, the parties state as follows:

1. In accordance with the Scheduling Order entered by the Court on or about January 10, 2020, the parties are to file any potentially dispositive motions no later than September 1, 2020. This deadline has not yet expired and therefore, this motion is timely.

2. Defendant Library had previously requested to take the deposition of Plaintiff. Plaintiff indicated she intended to seek a protective order limiting the ability of Defendants to inquiry into certain topics. Defendant Library agreed to allow Plaintiff the opportunity to seek a protective order prior to commencing her deposition.

3. On or about July 1, 2020, Defendant Library filed a Motion to Extend the Deadline to Complete Discovery by Taking Plaintiff’s Deposition (ECF No. 66) seeking an extension of the deadline to depose Plaintiff until thirty (30) days after the Court rules on Plaintiff’s motion for protective order.

4. On or about, July 2, 2020, the Court granted Defendant Library's Motion to Extend the Deadline to Complete Discovery by Taking Plaintiff's Deposition (ECF No.66). Order Granting Motion for Extension of Time (ECF No. 67).

5. On or about July 16, 2020, Plaintiff filed a Motion for Protective Order (ECF No. 69). On August 5, 2020, Defendants filed Suggestions in Opposition (ECF No. 73).

6. At this time, the Court has not ruled on Plaintiff's Motion for Protective Order (ECF No. 69).

7. For the reasons stated above, the parties seek additional time of the deadline to file dispositive motions until thirty (30) days after the deposition of Plaintiff and other discovery has been completed.

8. The parties are constrained to make this request out of necessity and not for the purpose of delay.

9. The parties will not be prejudiced by the extension of the aforementioned deadline.

10. The parties have made no prior requests for an extension to this deadline in this matter.

11. The parties do not anticipate that the granting of this extension will materially interfere with any of the other deadlines in this case.

WHEREFORE, Plaintiff Stacy Arnold and Defendants St. Joseph Public Library, City of St. Joseph and Rebecca Hailey jointly request that this Court grant them an additional thirty (30) days after the deposition of Plaintiff is concluded within which to file their dispositive motions.

Respectfully submitted,

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